

EXHIBIT G

FILED UNDER SEAL

1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY

2 IN THE UNITED STATES DISTRICT COURT

3 FOR THE EASTERN DISTRICT OF VIRGINIA

4 NORFOLK DIVISION

5 -----X
6 THE COLEMAN COMPANY, INC.,

7 Plaintiff/Counter-claim Defendant,

8 vs.

9 TEAM WORLDWIDE CORPORATION,

10 Defendant/Counter-claim Plaintiff.
11 -----X

12 ATTORNEYS' EYES ONLY

13 VIDEOTAPED DEPOSITION OF WILLIAM SINGHOSE, Ph.D

14 taken remotely via ZOOM

15 Atlanta, Georgia

16 Wednesday, August 18, 2021

17
18 REPORTED BY:

19 BOBBIE ZELTMAN
20 Professional Realtime Court Reporter
and Notary for New York and Florida
21 Located in Fort Lauderdale, Florida

22 Job Number 198481
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<p style="text-align: right;">Page 2</p> <p>1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY</p> <p>2</p> <p style="text-align: center;">August 18, 2021</p> <p style="text-align: center;">9:33 a.m.</p> <p>3</p> <p>4</p> <p>5 Videotaped deposition of WILLIAM SINGHOSE,</p> <p>6 Ph.D, taken by Plaintiff, pursuant to Notice, taken</p> <p>7 remotely via ZOOM in Atlanta, Georgia before BARBARA</p> <p>8 R. ZELTMAN, a Professional Realtime Court Reporter</p> <p>9 and Notary Public within and for the State of</p> <p>10 Florida.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 3</p> <p>1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY</p> <p>2 A P P E A R A N C E S:</p> <p>3</p> <p style="text-align: center;">***ALL APPEARING REMOTELY***</p> <p>4</p> <p>5</p> <p>6 RUYAK CHERIAN</p> <p>7 Attorneys for Team Worldwide Corporation</p> <p>8 1901 L Street, NW</p> <p>9 Washington, DC 20036</p> <p>10 BY: MICHAEL WOODS, ESQ.</p> <p>11</p> <p>12</p> <p>13 MEUNIER CARLIN & CURFMAN</p> <p>14 Attorneys for Defendant The Coleman Company</p> <p>15 999 Peachtree Street NE</p> <p>16 Atlanta, Georgia 30309</p> <p>17 BY: DAVID MORELAND, ESQ.</p> <p>18</p> <p>19</p> <p>20 ALSO PRESENT: Mark Von Lanken, Videographer</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 4</p> <p>1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY</p> <p>2</p> <p>3 IT IS HEREBY STIPULATED AND AGREED</p> <p>4 by and between the attorneys for the respective</p> <p>5 parties herein that filing and sealing be and</p> <p>6 the same are hereby waived.</p> <p>7 IT IS FURTHER STIPULATED AND AGREED</p> <p>8 that all objections, except as to the form of</p> <p>9 the question, shall be reserved to the time</p> <p>10 of trial.</p> <p>11 IT IS FURTHER STIPULATED AND AGREED</p> <p>12 that the within deposition may be signed and</p> <p>13 sworn to before any officer authorized to</p> <p>14 administer an oath with the same force and</p> <p>15 effect as if signed and sworn to before</p> <p>16 the Court.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY</p> <p>2 THE VIDEOGRAPHER: Good</p> <p>3 morning, Counselors.</p> <p>4 My name is Mark Von Lanken. I'm a</p> <p>5 certified legal videographer in</p> <p>6 association with TSG Reporting, Inc.</p> <p>7 Due to the severity of the COVID-19</p> <p>8 and following the practice of social</p> <p>9 distancing, I will not be in the same</p> <p>10 room with the witness; instead, I will</p> <p>11 record this videotaped deposition</p> <p>12 remotely.</p> <p>13 The reporter, Barbara Zeltman, also</p> <p>14 will not be in the same room and will</p> <p>15 swear the witness in remotely.</p> <p>16 Do all parties stipulate to the</p> <p>17 validity of this video recording and</p> <p>18 remote swearing and that it will be</p> <p>19 admissible in the courtroom as if it had</p> <p>20 been taken following Rule 30 of the</p> <p>21 Federal Rules of Civil Procedures and the</p> <p>22 state's rules where this case is pending?</p> <p>23 MR. MORELAND: Yes, for</p> <p>24 The Coleman Company.</p> <p>25 MR. WOODS: Team Worldwide</p>

<p style="text-align: right;">Page 74</p> <p>1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY</p> <p>2 surface. It just sat there and satisfied my</p> <p>3 needs as a user of an air mattress.</p> <p>4 So it doesn't come to mind that</p> <p>5 that would be a real strong marketable</p> <p>6 feature, so I'm not surprised that a lot of</p> <p>7 people don't do it. But I think people have</p> <p>8 done it in the past and I think it would be</p> <p>9 easy to do.</p> <p>10 Q Let's go now to Exhibit 1, your</p> <p>11 opening report on the '618 patent.</p> <p>12 MR. WOODS: Bear with me one</p> <p>13 moment.</p> <p>14 BY MR. WOODS:</p> <p>15 Q I'm looking now at the section that</p> <p>16 begins with Paragraph 64 in Exhibit 1, your</p> <p>17 opening report.</p> <p>18 Let me know when you're there,</p> <p>19 please.</p> <p>20 A Okay, I'm there.</p> <p>21 Q In this section, you're looking at</p> <p>22 Claim 1.e of the '618 patent, which says,</p> <p>23 "At least one mattress coil disposed within</p> <p>24 said air chamber that at least one coil</p> <p>25 being affixed to and extending continuously</p>	<p style="text-align: right;">Page 75</p> <p>1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY</p> <p>2 from the first panel to the second panel,</p> <p>3 respectively."</p> <p>4 Going to the next page at the top</p> <p>5 of Page 28, you have an image there of a</p> <p>6 cross-section of an accused TWW product.</p> <p>7 And is it your opinion that</p> <p>8 those -- that what's shown there meets the</p> <p>9 claim element for mattress coils?</p> <p>10 MR. MORELAND: Objection.</p> <p>11 Form. I think you said Page 28. I</p> <p>12 think you were referring to Page 26</p> <p>13 of 28.</p> <p>14 MR. WOODS: Yeah, I'm sorry.</p> <p>15 BY MR. WOODS:</p> <p>16 Q I took you to what was Page 27 to</p> <p>17 get you to Paragraph 64 and now going to the</p> <p>18 next page looking at the top of Page 28.</p> <p>19 A I think I understood the question.</p> <p>20 Q Exhibit 1. Okay.</p> <p>21 MR. MORELAND: Michael, you may</p> <p>22 have to repeat that question.</p> <p>23 MR. WOODS: I'm sorry. Okay.</p> <p>24 I thought he said he understood the</p> <p>25 question. Okay.</p>
<p style="text-align: right;">Page 76</p> <p>1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY</p> <p>2 BY MR. WOODS:</p> <p>3 Q Looking at the top of Page 28, you</p> <p>4 have an image of a cross-section of an</p> <p>5 accused TWW product.</p> <p>6 Is it your opinion that what's</p> <p>7 shown there meets this claim element</p> <p>8 involving mattress coils?</p> <p>9 A Yes.</p> <p>10 Q And what is your understanding of</p> <p>11 what is required for something to be a</p> <p>12 mattress coil in the context of the</p> <p>13 '618 patent?</p> <p>14 A I think the '618 patent mattress</p> <p>15 coil indicates some physical structure that</p> <p>16 extends, as it says in the limitation,</p> <p>17 continuously from the first panel, the top</p> <p>18 panel to the bottom panel. So the</p> <p>19 structures that extend between those two</p> <p>20 would tend to hold those surfaces, those</p> <p>21 panels together when it's inflated.</p> <p>22 Q So then it's your opinion that</p> <p>23 what's shown -- strike that.</p> <p>24 Is it your opinion then that it</p> <p>25 just needs to be something that holds those</p>	<p style="text-align: right;">Page 77</p> <p>1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY</p> <p>2 two that run continuously from the first</p> <p>3 panel to the second panel?</p> <p>4 MR. MORELAND: Object to scope.</p> <p>5 Foundation.</p> <p>6 Go ahead.</p> <p>7 A Yes, the '618 doesn't clarify what</p> <p>8 exactly these should look like in detail.</p> <p>9 There's just some material that extends from</p> <p>10 the top to the bottom and the obvious use of</p> <p>11 those is that when you put air in here, it</p> <p>12 stops the two surfaces from spreading too</p> <p>13 far apart.</p> <p>14 MR. WOODS: Bear with me just a</p> <p>15 moment.</p> <p>16 Dr. Singhose, I've uploaded to the</p> <p>17 Chat feature what's been marked as</p> <p>18 Exhibit 7.</p> <p>19 Please let me know when you have</p> <p>20 that downloaded and open, please.</p> <p>21 THE WITNESS: Okay. I have</p> <p>22 that downloaded and open.</p> <p>23 (Singhose Exhibit 7, US Patent</p> <p>24 No. 7,089,618 to Metzger,</p> <p>25 COLEMAN_0000001 through</p>

<p style="text-align: right;">Page 78</p> <p>1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY</p> <p>2 COLEMAN_0000009, was marked for</p> <p>3 Identification.)</p> <p>4 BY MR. WOODS:</p> <p>5 Q You have in front of you what's</p> <p>6 been marked as Singhose Exhibit 7.</p> <p>7 It is US Patent Number 7,089,618.</p> <p>8 It is a nine-page document with a beginning</p> <p>9 Bates number in the lower right -- starting</p> <p>10 in the lower right of the first page of</p> <p>11 COLEMAN_0000001.</p> <p>12 Are you familiar with this</p> <p>13 document?</p> <p>14 A Yes.</p> <p>15 Q If you can go please to Column 5</p> <p>16 and I'm looking at the paragraph that begins</p> <p>17 about Line 11.</p> <p>18 Let me know when you're there.</p> <p>19 A Okay.</p> <p>20 Q It says in this paragraph beyond</p> <p>21 the second line, it says, "Each coil 18 has</p> <p>22 a first elongated member 19 and a space</p> <p>23 second elongate member 20 joined at one end</p> <p>24 to a first plate 21 and at a space second</p> <p>25 end to a second plate 23."</p>	<p style="text-align: right;">Page 79</p> <p>1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY</p> <p>2 Is it your understanding that the</p> <p>3 claim limitations which require mattress</p> <p>4 coils in the '618 are limited to this</p> <p>5 description in the specification about a</p> <p>6 coil?</p> <p>7 MR. MORELAND: Object to scope.</p> <p>8 Go ahead.</p> <p>9 A No, I do not think there's mention</p> <p>10 of limited to the description of a coil that</p> <p>11 is just in that one part of the patent</p> <p>12 because the coils and their properties are</p> <p>13 discussed in other parts of the patent as</p> <p>14 well.</p> <p>15 BY MR. WOODS:</p> <p>16 Q I'm sorry. I was on mute again.</p> <p>17 Thank you.</p> <p>18 If you can go back please to</p> <p>19 Exhibit 1 at the top of Page 28 again and</p> <p>20 just let me know when you're there.</p> <p>21 A Okay.</p> <p>22 Q I'm sorry. Did you say you're</p> <p>23 there?</p> <p>24 A Yes, I'm there.</p> <p>25 Q Oh, okay. Apologies. I didn't get</p>
<p style="text-align: right;">Page 80</p> <p>1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY</p> <p>2 that one.</p> <p>3 Okay. In the top of the page is a</p> <p>4 photo what you showed as you identified as</p> <p>5 mattress coils going from a first panel to a</p> <p>6 second panel.</p> <p>7 In the accused products, did you</p> <p>8 see any instances where those coils, what</p> <p>9 you've identified as coils went through what</p> <p>10 you've identified to the left -- on the left</p> <p>11 side of that image as side support beams?</p> <p>12 A No.</p> <p>13 MR. WOODS: Just bear with me</p> <p>14 just one second.</p> <p>15 BY MR. WOODS:</p> <p>16 Q If you can go now to Exhibit 3,</p> <p>17 your reply report of August 12, 2021,</p> <p>18 please, and go to Paragraph 16 and let me</p> <p>19 know when you're there.</p> <p>20 A Okay. I'm there.</p> <p>21 Q And it's your opinion that the</p> <p>22 accused TWW products do not have multiple</p> <p>23 air chambers; is that correct?</p> <p>24 A Yes.</p> <p>25 Q Looking back now to the TWW's</p>	<p style="text-align: right;">Page 81</p> <p>1 WILLIAM SINGHOSE, Ph.D - ATTORNEYS' EYES ONLY</p> <p>2 '926 patent, is it your opinion that the</p> <p>3 '926 patent claims multiple air chambers?</p> <p>4 A Just turn back to the '926 patent</p> <p>5 that you are asking about and took a quick</p> <p>6 look at Claim 1, and in Claim 1 it is</p> <p>7 claiming an upper air chamber, an annular</p> <p>8 lower peripheral air chamber, so the</p> <p>9 '926 patent is claiming two air chambers in</p> <p>10 the way it uses the phrase "air chamber."</p> <p>11 Q And you understand that TWW argues</p> <p>12 that the accused products here practice</p> <p>13 TWW's '926 patent; is that correct?</p> <p>14 A Just to clarify, since there's a</p> <p>15 suit and countersuit, the TWW products</p> <p>16 practice the '926 -- I think what you are</p> <p>17 saying --</p> <p>18 Q Let me rephrase. You are right,</p> <p>19 that's not clear. Let me rephrase.</p> <p>20 Do you understand that TWW states</p> <p>21 that the TWW products accused by Coleman of</p> <p>22 infringing the '618 patent practice TWW's</p> <p>23 '926 patent?</p> <p>24 A Yes, that is very clear.</p> <p>25 Q But you've offered opinions that</p>